UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

FILED

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U.S. DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

CHARLES DENNO,
Defendant.

Cr. No. 17 08S
In violation of
18 U.S.C. § 1343

INFORMATION

The United States Attorney charges that:

General Allegations

At all times relevant to this Information:

1. The Providence Plan was a non-profit educational entity located in Providence, Rhode Island, which received federal, state and private grant funds, including grant funds from the United States Department of Education (hereinafter known as "the Department of Education"), the State of Rhode Island and the Bloomberg Family Foundation. These grant funds were to be used to support educational programs for adults and children in Rhode Island. Annually, the federal grant funds awarded to the Providence Plan totaled in excess of four million dollars.

2. The defendant, CHARLES DENNO (hereinafter "DENNO") was employed as the Providence Plan's finance director.

3. As part of his duties, DENNO was authorized to cause electronic transfers of federal, state and private grant funds awarded to the Providence Plan and prepare check payments for legitimate business expenses incurred by the Providence Plan.

4. DENNO did not have check signing authority for the Providence Plan bank accounts.

5. DENNO was also the owner of a personal business entity named CMG Enterprises (hereinafter known as "CMG"). DENNO was the sole signatory on CMG's business bank account.

6. The Providence Plan did not incur any legitimate expenses from CMG or from DENNO as a representative of CMG.

COUNT 1
18 U.S.C. § 1343 - WIRE FRAUD

7. The allegations set forth in paragraphs one (1) through (6) are re-alleged and incorporated by reference as if fully set forth herein.

8. Beginning by at least 2012 and continuing through July 2016, in the District of Rhode Island and elsewhere, the defendant, CHARLES DENNO, knowingly devised and intended to devise a scheme and artifice to defraud, and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

THE SCHEME TO DEFRAUD

9. It was the object of the scheme to defraud for DENNO to unjustly enrich himself by fraudulently converting funds granted to the Providence Plan for its legitimate purposes to his own use.

MANNER AND MEANS OF THE FRAUD SCHEME

The manner and means through which the scheme to defraud was accomplished included, among others, the following:

10. It was part of the scheme to defraud that DENNO used his authority to cause the

Department of Education and Bloomberg Family foundation to deposit funds in the Providence Plan bank accounts via Automated Clearing House ("ACH") payments and fraudulently converted those funds to his own personal use. Such funds were designated for use by the Providence Plan for its legitimate purposes. The total amount of funds fraudulently converted from the Providence Plan to DENNO's personal use was in excess of $550,000.

11. It was further part of the scheme to defraud that DENNO fraudulently prepared and issued Providence Plan checks made payable to CMG in various amounts. The Providence Plan check payments originated from Providence Plan bank accounts that contained federal, state, and private grant funds, including grant funds from the Department of Education, the State of Rhode Island and the Bloomberg Foundation. The payments issued to CMG were not authorized and contained a forgery of the authorized check signing official at the Providence Plan.

12. It was further part of the scheme to defraud that DENNO deposited the Providence Plan check payments into the CMG business bank account.

13. It was further part of the scheme to defraud that DENNO subsequently made multiple withdrawals from the CMG bank account in various forms, including credit card payments, check payments and ATM cash withdrawals at Twin River Casino located in Lincoln, Rhode Island.

EXECUTION OF THE SCHEME

14. On or about June 30, 2016, in the District of Rhode Island, and elsewhere, for the purpose of executing the aforementioned scheme and artifice, and attempting to do so,

the defendant, CHARLES DENNO, did knowingly transmit and cause to be transmitted in interstate commerce by means of wire communication, the material set forth below, among others:

On or about June 30, 2016, DENNO used his authority to draw down funds to cause the Department of Education to deposit grant funds of $58,000 via ACH to a Providence Plan bank account located in Rhode Island. The ACH payment was requested by DENNO and purportedly related to authorized grant expenses incurred by the Providence Plan, when in truth DENNO intended to and did converts the funds to his own use.

All in violation of 18 U.S.C. § 1343.

PETER F. NERONHA
UNITED STATES ATTORNEY

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Criminal Division Deputy Chief

Date: 1-26-2017